

AO 257 (Rev. 6/78)

**DEFENDANT INFORMATION RELATIVE TO A CRIMINAL ACTION - IN U.S. DISTRICT COURT**BY: ☐ COMPLAINT ☐ INFORMATION ☒ INDICTMENT ☐ SUPERSEDING**OFFENSE CHARGED**18 U.S.C. § 1029(a)(5) - Fraud Exceeding \$1,000 Using Others' Access Devices  
18 U.S.C. § 1029(b)(2) - Conspiracy to Use Others' Access Devices☐ Petty  
☐ Minor  
☐ Misdemeanor  
☒ Felony**PENALTY:**15 years prison, \$250,000 fine, 3 years supervised release, \$100 special assessment.  
7.5 years prison, \$250,000 fine, 3 years supervised release, \$100 special assessment**PROCEEDING**Name of Complainant Agency, or Person (& Title, if any)  
United States Secret Service, Special Agent Daniel Yang☐ person is awaiting trial in another Federal or State Court, give name of court☐ this person/proceeding is transferred from another district per (circle one) FRCrP 20, 21 or 40. Show District☐ this is a reprosecution of charges previously dismissed which were dismissed on motion of:☐ U.S. Att'y ☐ Defense☐ this prosecution relates to a pending case involving this same defendant☐ prior proceedings or appearance(s) before U.S. Magistrate regarding this defendant were recorded underSHOW  
DOCKET NO.MAGISTRATE  
CASE NO.Name and Office of Person  
Furnishing Information on  
THIS FORM

JOSEPH P. RUSSONIELLO

☒ U.S. Att'y ☐ Other U.S. Agency

Name of Asst. U.S. Att'y (if assigned) OWEN P. MARTIKAN

Name of District Court, and/or Judge/Magistrate Location  
NORTHERN DISTRICT OF CALIFORNIA**DEFENDANT - U.S.**

YANG CAO

DISTRICT COURT NUMBER

**MHP****DEFENDANT****IS NOT IN CUSTODY**

- 1) ☒ Has not been arrested, pending outcome this proceeding. If not detained give date any prior summons was served on above charges
- 2) ☐ Is a Fugitive
- 3) ☐ Is on Bail or Release from (show District)

**IS IN CUSTODY**

- 4) ☐ On this charge
- 5) ☐ On another conviction
- 6) ☐ Awaiting trial on other charges
- ☐ Fed'l ☐ State

If answer to (6) is "Yes", show name of institution

Has detainer been filed? ☐ Yes ☐ No } If "Yes" give date filed**DATE OF ARREST**

Month/Day/Year

Or... if Arresting Agency &amp; Warrant were not

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Month/Day/Year

☐ This report amends AO 257 previously submitted**ADDITIONAL INFORMATION OR COMMENTS****PROCESS:**☐ SUMMONS ☐ NO PROCESS\*☒ WARRANT Bail Amount: No Bail

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☐ Arraignment ☐ Initial Appearance

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YANG HUA MEI

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☒ U.S. Att'y ☐ Other U.S. Agency

Name of Asst. U.S. Att'y (if assigned) OWEN P. MARTIKAN

**DEFENDANT - U.S.**

SHI GUANG GUAN

DISTRICT COURT NUMBER

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Before Judge:

Comments:

# United States District Court

FOR THE  
NORTHERN DISTRICT OF CALIFORNIA  
CRIMINAL DIVISION  
VENUE: SAN FRANCISCO

E-filing

MHP

FILED

APR 10 PM 12:52

U.S. DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,  
v.

SHI GUANG GUAN, JASON HOANG,  
YANG HUA MEI, and YANG CAO

DEFENDANT.

## INDICTMENT

18 U.S.C. § 1029(a)(5) - Fraud Exceeding \$1,000 Using  
Others' Access Devices  
18 U.S.C. § 1029(b)(2) - Conspiracy to Use Others'  
Access Devices

*Indict*

A true bill.

*[Signature]*

Foreman

Filed in open court this 10 day of APRIL  
2008

*[Signature]*

Clerk

Bail, \$

*NO BAIL ARREST WARRANTS - ALL AT*

*[Signature]*

JOSEPH P. RUSSONIELLO (CABN 44332)  
United States Attorney  
Attorney for Plaintiff

FILED  
APR 10 PM 12:51  
CLERK OF U.S. DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA

E-filing

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION

UNITED STATES OF AMERICA,

Plaintiff,

v.

SHI GUANG GUAN, JASON HOANG,  
YANG HUA MEI, and YANG CAO,

Defendants.

CR 08  
No.

08

MHP

VIOLATIONS: 18 U.S.C. § 1029(b)(2) –  
Conspiracy to Use Access Devices  
Issued to Others; 18 U.S.C. § 1029(a)(5)  
– Fraudulent Use of Access Devices  
Issued to Others (Four Counts).

SAN FRANCISCO VENUE

INDICTMENT

The Grand Jury charges:

COUNT ONE: 18 U.S.C. § 1029(b)(2) – Conspiracy to Use Access Devices Issued  
to Others

On or about and between May 7, 2005 and December 9, 2005, in the Northern  
District of California and elsewhere, the defendants

SHI GUANG GUAN,  
JASON HOANG,  
YANG HUA MEI, and  
YANG CAO,

did knowingly and intentionally conspire and agree to fraudulently use one or more

INDICTMENT

1 access devices issued to other persons to obtain things of value aggregating \$1,000 or  
2 more during that period, in violation of Title 18, United States Code, Section 1029(a)(5).

3 Overt Acts

4 As part of the conspiracy and to carry out its objects, the defendants committed or  
5 caused to be committed the following overt acts, among others, in the Northern District of  
6 California:

- 7 a. On or about May 18, 2005, GUAN used a Chase Bank of New York Visa  
8 credit card with an account number ending in 4877 to pay for purchases at  
9 the Birdnest King Distribution Company in San Francisco, California.
- 10 b. On or about May 20, 2005, GUAN used a Chase Bank of New York Visa  
11 credit card with an account number ending in 8150 to pay for purchases at  
12 the Birdnest King Distribution Company in San Francisco, California.
- 13 c. On or about May 15, 2005, HOANG used a Chase Bank of New York Visa  
14 credit card with an account number ending in 6099 to pay for purchases at  
15 the Birdnest King Distribution Company in San Francisco, California.
- 16 d. On or about May 15, 2005, MEI used a Chase Bank of New York Visa  
17 credit card with an account number ending in 8212 to pay for purchases at  
18 the Birdnest King Distribution Company in San Francisco, California.
- 19 e. On or about July 15, 2005, CAO used a Chase Bank of New York Visa  
20 credit card with an account number ending in 3727 to pay for purchases at  
21 the Collective Antiques store in San Francisco, California.

22 All in violation of Title 18, United States Code, Section 1029(b)(2).  
23

24 COUNT TWO: 18 U.S.C. § 1029(a)(5) – Fraudulent Use of Access Devices

25 On or about and between May 7, 2005 and December 9, 2005, in the Northern  
26 District of California, the defendant

27 SHI GUANG GUAN,

28 did knowingly and with intent to defraud effect transactions with at least one access

1 device issued to another person to receive payment and things of value, the aggregate  
2 value of which was equal to or greater than \$1,000 during that period, and did attempt to  
3 do so, and, in so doing, affected interstate commerce, in violation of Title 18, United  
4 States Code, Section 1029(a)(5).

5  
6 COUNT THREE: 18 U.S.C. § 1029(a)(5) – Fraudulent Use of Access Devices

7 On or about and between May 7, 2005 and December 9, 2005, in the Northern  
8 District of California, the defendant

9 JASON HOANG,

10 did knowingly and with intent to defraud effect transactions with at least one access  
11 device issued to another person to receive payment and things of value, the aggregate  
12 value of which was equal to or greater than \$1,000 during that period, and did attempt to  
13 do so, and, in so doing, affected interstate commerce, in violation of Title 18, United  
14 States Code, Section 1029(a)(5).

15  
16 COUNT FOUR: 18 U.S.C. § 1029(a)(5) – Fraudulent Use of Access Devices

17 On or about and between May 7, 2005 and December 9, 2005, in the Northern  
18 District of California, the defendant

19 YANG HUA MEI,

20 did knowingly and with intent to defraud effect transactions with at least one access  
21 device issued to another person to receive payment and things of value, the aggregate  
22 value of which was equal to or greater than \$1,000 during that period, and did attempt to  
23 do so, and, in so doing, affected interstate commerce, in violation of Title 18, United  
24 States Code, Section 1029(a)(5).

25  
26 COUNT FIVE: 18 U.S.C. § 1029(a)(5) – Fraudulent Use of Access Devices

27 On or about and between May 7, 2005 and December 9, 2005, in the Northern  
28 District of California, the defendant



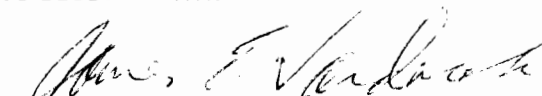
1 YANG CAO,

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3 issued to another person to receive payment and things of value, the aggregate value of which  
4 was equal to or greater than \$1,000 during that period, and did attempt to do so, and, in so doing,  
5 affected interstate commerce, in violation of Title 18, United States Code, Section 1029(a)(5).  
6  
7

8 DATED:

A TRUE BILL.


9 4-10-08

10   
FOREPERSON

11 JOSEPH P. RUSSONIELLO  
12 United States Attorney

13   
14 KYLE F. WALDINGER  
15 Deputy Chief, Major Crimes Section

16 (Approved as to form:

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AUSA MARTIKAN  
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